

REMARKS

Reconsideration and allowance are respectfully requested in view of the foregoing Amendments and the following remarks.

Claims 1-17 are pending in this application.

Claim 18-26 have been canceled without prejudice.

Regarding the § 103 Rejection

Applicant respectfully points out that § 706.02(j) of the MPEP holds that there are three necessary elements to establish a *prima facie* case of obviousness, as adopted by *In Re Vaeck*. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one ordinarily skilled in the art, to modify the reference or combine the reference teachings, *In Re Vaeck*, 947 F2d 488. Second, there must be a reasonable expectation of success. Finally, the prior art reference, or references when combined, must teach or suggest all the claim limitations. The teachings or suggestions to make the claimed combination and their reasonable expectation of success must both be found in the prior art and not be based on the Applicant's disclosure. *Id.*

Claims 1-26 were rejected under 35 USC § 103(a) as being rendered obvious by *Curry* (U.S. Patent No. 6,032,248), in view of Stan Liao et al., *Code Optimization Techniques for Imbedded DSP Microprocessors*, by Stan Liao, Srinivas Devdas, Kurt Keutzer, Steve Tjiang and Albert Wang, January 1995, *Proceedings of the 32nd ACM/IEEE conference on design automation*. (Hereinafter "Liao").

Applicant has canceled claims 18-26 without prejudice, thereby rendering the rejection to these claims moot.

Irregardless of the cancellation of claims 18-26, Applicant points out that *Curry* teaches a data pointer select bit (DPS) that can be used in conjunction with control bit (EEMEN), which is

used to distinguish between access to internal and external data memory. Applicant agrees with the Examiner that Curry teaches two data pointers, each data pointer pointing to a data memory location. Applicant would also agree with the Examiner that Curry does not expressly teach the controlling of automatically incrementing/decrementing a selected data pointer based on the value of an automatic increment/decrement (AID). Curry, Col. 9, lines 5-30.

Liao discusses auto incrementing or decrementing of a single data pointer based on the output of an address generation unit (AGU). Liao, Fig. 1, pg. 1-2, sec. II. Liao does not discuss or suggest the use of two data pointers. Furthermore, Liao does not discuss automatically incrementing/decrementing one of two selected data pointers. At best, Liao teaches or suggests the automatic incrementing/decrementing of a single data pointer. There is no suggestion or motivation in either of the references, Curry or Liao, to modify either reference or combine their teachings to teach a "microcontroller core being capable of automatically incrementing/decrementing a selected one of the two data pointers based upon a value of an automatic increment/decrement (AID) enable bit and upon execution of a data pointer related instruction." Second, there is no reasonable expectation of success when combining Curry and Liao, because at best the combination of Curry and Liao will only allow one data pointer to be automatically incremented/decremented. As such, no success is expected. Thirdly, the prior art references, Curry and Liao, when combined, do not teach or suggest all the limitations of the presently claimed invention. Again, neither reference teaches, suggests or alludes to "a microcontroller core being capable of automatically incrementing/decrementing a selected one of two data pointers." There is no teaching of all the elements, no teaching of how to make or use the elements, and no suggestion to combine the reference.

As such, Applicant respectfully traverses this § 103 rejection and submits that the claims are all in condition for allowance over the cited art, because a *prima facie* case of obviousness has not been satisfied. Applicant respectfully requests that this § 103 rejection be withdrawn.

Should the Examiner have any further questions or comments facilitating allowance, the Examiner is invited to contact Applicant's representative indicated below to further the prosecution of this application toward allowance and issuance.

In view of the above amendment, it is believed that this application is in condition for allowance, and a Notice is respectfully requested.

Dated: 6-3-05

Respectfully submitted,

By

Steven R. Greenfield

Registration No.: 38,166

JENKENS & GILCHRIST, A PROFESSIONAL
CORPORATION

1445 Ross Avenue, Suite 3200

Dallas, Texas 75202

(214) 855-4500

Attorneys For Applicant